

REES F. MORGAN (State Bar No. 229899)
 JONATHAN R. BASS (State Bar No. 75779)
 STAN ROMAN (State Bar No. 87652)
 MARI SAHAKYAN CLIFFORD (State Bar No. 331152)
 WILLIAM ABRAMOVITZ (State Bar No. 319385)
 COBLENTZ PATCH DUFFY & BASS LLP
 One Montgomery Street, Suite 3000
 San Francisco, California 94104-5500
 Telephone: 415.391.4800
 Facsimile: 415.989.1663
 Email: ef-rfm@cpdb.com
 ef-jrb@cpdb.com
 ef-sgr@cpdb.com
 ef-msc@cpdb.com
 ef-wia@cpdb.com

Attorneys for Claimants
 First 100, LLC, 1st One Hundred Holdings, LLC
 and Battle Born Investments Company, LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin
 Gold (BTG), Bitcoin SV (BSV), and Bitcoin
 Cash (BCH) seized from
 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

Defendant.

First 100, LLC, 1st One Hundred Holdings,
 LLC, and Battle Born Investments Company,
 LLC,

Claimants.

Case No. 3:20-cv-07811-RS

**DECLARATION OF JAY BLOOM IN
 SUPPORT OF CLAIMANTS'
 OPPOSITION TO MOTION TO STRIKE
 THE CLAIMS OF CLAIMANTS BATTLE
 BORN INVESTMENTS COMPANY, LLC,
 FIRST 100, LLC AND 1ST ONE
 HUNDRED HOLDINGS, LLC**

Date: September 9, 2021
 Time: 1:30 p.m.
 Ctrm: 3 (Via Zoom)

The Hon. Richard Seeborg

Trial Date: None Set

DECLARATION OF JAY BLOOM

I, Jay Bloom, declare as follows:

1. I am a founder and Director of Claimants First 100, LLC, 1st One Hundred Holdings, LLC and Battle Born Investments Company, LLC (hereinafter collectively “Claimants”). I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. Since 2017, I have hired data scientists, forensic experts, private investigators and attorneys to assist Claimants in tracking down Raymond Ngan’s assets in Claimants’ efforts to enforce a \$2,211,039,718.46 judgment against him, and to track down the assets that Claimants acquired as part of their purchase of Raymond Ngan’s Bankruptcy Estate on May 14, 2018.

3. One group of forensic experts that I hired to review Mr. Ngan’s electronically stored information was Holo Discovery. In April 2019, Holo Discovery imaged Mr. Ngan’s computer and uploaded the images to a database.

4. I also engaged a private investigator, Lou Cologiovani from Isotro Consulting, to conduct a forensic review of Mr. Ngan’s imaged devices in the Relativity database.

5. On information and belief, Mr. Cologiovani’s review of the Mr. Ngan’s imaged files revealed Mr. Ngan’s business correspondence that indicated his control over the 1HQ3 Wallet.

6. On January 28, 2021, I received text messages from my business partner, John Cooper, informing me that the same amount of Bitcoins contained in the 1HQ3 Wallet, worth over \$2.3 billion that day, had been transferred to another Bitcoin wallet, bc1qa5wkgaw2dkv56kfvj49j0av5nml45x9ek9hz6, three months earlier. John’s text also had a link to an article dated November 5, 2020 entitled “Record \$1 billion worth of Bitcoin linked to the Silk Road seized by U.S. Government,” which reported that “69,370 Bitcoins — worth about \$1 billion — had been moved out of a Bitcoin wallet” and seized. Attached as Exhibit 1 is a true and correct copy of these January 28, 2021 text messages that I received from John Cooper. This

18906.0014823-9082-0596.3

-2-

Case No. 3:20-cv-07811-RS

1 was the first time I became aware that the Bitcoin in the 1HQ3 Wallet associated with Mr. Ngan
 2 had been removed. I later learned it had been removed due to seizure by the Government.

3 7. As soon as I found out about the seizure I promptly began searching for attorneys
 4 to assist Claimants in defending their claim to the 1HQ3 Wallet. Throughout the month of
 5 February I engaged several counsel for the instant matter including Mr. Guy Lewis, former U.S.
 6 Attorney for the Southern District of Florida and former Director of the Executive Office for
 7 United States Attorneys. On or about February 27, 2021 Claimants also engaged Fox Rothschild
 8 to represent their interest in the 1HQ3 wallet.

9 8. Claimants were not served with notice of the forfeiture and were unaware of any
 10 published notice until the Government provided a copy of the Declaration of Publication on May
 11 24, 2021.

12 I declare under penalty of perjury under the laws of the United States of America that the
 13 foregoing is true and correct.

14
 15 Executed on this 10th day of August, 2021, in Las Vegas, Nevada.

16
 17 
 18 JAY BLOOM
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

Exhibit 1

6:03



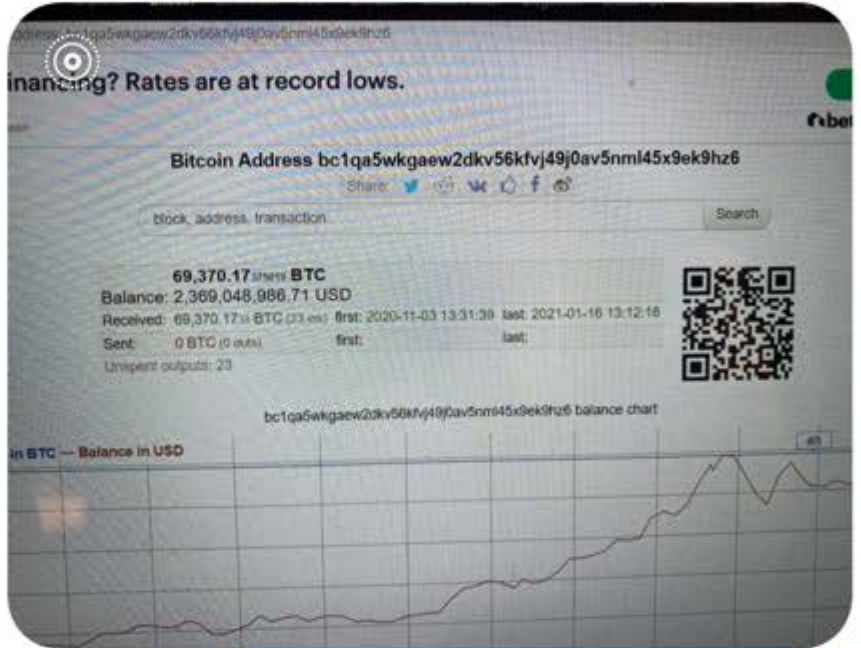
< 178



Jon >

Thu, Jan 28, 7:11 PM

Please give me a call when you're alone and have two seconds



Looks like it's in Coinbase

\$2,369,048,986.71

Man - that is a number



iMessage



< 178



Jon >

Man - that is a number



Record \$1 billion worth of bitcoin linked to the Silk Road seized by U.S. government

[cnbc.com](https://www.cnbc.com)

I can't decide if you are now going to be up all night or if you will finally be able to rest 😄

Lol